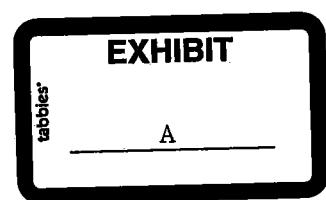


**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

AAMCO TRANSMISSIONS, INC.,)	Case No. 2010-cv-2717
Plaintiff,)	Judge James G. Carr
v.)	<u>PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO ALL DEFENDANTS</u>
LYDIA ERTLE, et al.,)	
Defendants.)	
)	Keith Wilkowski (0013044)
)	Roman Arce (0059887)
)	MARSHALL & MELHORN, LLC
)	Four SeaGate, Eighth Floor
)	Toledo, Ohio 43604
)	(419) 249-7100
)	(419) 249-7151 (Fax)
)	<u>wilkowski@marshall-melhorn.com</u>
)	<u>arce@marshall-melhorn.com</u>
)	Attorneys for Plaintiff
)	

Plaintiff, AAMCO Transmission, Inc. ("ATI"), pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby submits its First Set of Requests for Production of Documents to the Defendants. Pursuant to Court order, the Defendants are required to produce the requested documents to undersigned counsel for ATI on or before December 15, 2010. These Requests for Production are continuing in nature, and it is hereby requested that any newly discovered or additional information or documentation in response to these Requests for Production be supplied immediately upon such matter coming to the attention of Defendants or Defendants' counsel.



"You" or "Your" refers to Defendants and/or the person answering these requests for production, plus your agents, servants, attorneys, private investigators, employees, ex-employees, other representatives, and others who are in the possession of, or may have obtained information for or on behalf of, any of the aforementioned persons.

The term "document" is used herein in its broadest sense and includes any original, reproduction, or copy of any kind of a written or documented material, and including without limitations, correspondence, memoranda, inter-office communications, notes, diaries, contract documents, drawings, plans, specifications, estimates, vouchers, permits, written ordinances, minutes of meetings, invoices, billings, checks, reports, studies, telegraphs, notes of telephone conversations, notes of oral communications and computer-stored information which is retrievable in any graphic form. "Document" as referred to herein also includes photographs, videotapes and digital images.

REQUEST FOR PRODUCTION NO. 1:

Please produce a copy of all agreements entered into between or among any of the Defendants concerning the operation of any business from January 1, 2008 to the present, including but not limited to shareholder agreements, close corporation agreements, partnership agreements, franchise agreements, operating agreements or agreements to share costs, expenses, income, profits or losses.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2:

Please produce a copy of all agreements between any of the Defendants and any third party, including but not limited to AAA Transmission and AAA Transmission Specialists, concerning the operation of any business from January 1, 2008 to the present, including but not limited to shareholder agreements, close corporation agreements, partnership agreements, franchise agreements, operating agreements or agreements to share costs, expenses, income, profits or losses.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3:

Please produce a copy of all agreements that relate to, concern or reference AAA Transmission or AAA Transmission Specialists, which were in effect at any time from January 1, 2008 to the present, excluding agreements with customers for automotive repairs or services.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4:

Please produce a copy of all documents dated from January 1, 2008 to the present, which relate to any agreement to sell business assets (whether or not such agreements were consummated), including but not limited to real estate, personal property and/or goodwill, related to the business operating at 5250 Airport Highway, Toledo, Ohio.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5:

Please produce a copy of all monthly account statements and all cancelled checks for all bank accounts owned or maintained by any and all automotive business or businesses that operated at 5250 Airport Highway, Toledo, Ohio at any time from January 1, 2008 to the present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6:

Please produce a copy of all corporate minutes, resolutions and formal or informal actions of the board of directors, shareholders or members of Defendant Mechanical Woman, Inc. from January 1, 2008 to the present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7:

Please produce a copy of all documents dated from January 1, 2008 to the present that relate to the sale or purchase of assets of any business or businesses located at 5250 Airport Highway, Toledo, Ohio.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8:

Please produce a copy of all bank account statements and cancelled checks for all bank accounts owned or maintained by any of the Defendants at any time from January 1, 2008 to the present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9:

Please produce a copy of all documents referring or relating to requests to establish or maintain telephone service for any business or businesses operating at 5250 Airport Highway, Toledo, Ohio at any time from January 1, 2008 to the present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10:

Please produce a copy of the federal income tax returns for Defendants, Mechanical Woman, Inc., Lydia Ertle, and Thomas Gamble, for the years 2008 and 2009.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11:

Please produce a copy of all documents that evidence, relate, or refer to any person's ownership or financial interest in Defendant Mechanical Woman, Inc., AAA Transmission, or AAA Transmission Specialists.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12:

Please produce a copy of all documents that evidence or relate to the transfer of funds, by check, cash or electronic means, from any bank account owned, maintained, or in the name of Defendant Ertle (or any business she controls) to or from any bank account owned, maintained, or in the name of Defendant Gamble (or any business he controls) at any time from January 1, 2008 to the present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13:

Please produce a copy of all documents, including but not limited to employee rosters and lists of employees, identifying the employees of Defendant Mechanical Woman, Inc., AAA Transmission, and AAA Transmission Performance Specialists from January 1, 2010 to the present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14:

Please produce a copy of all financial statements, including but limited to bank statements, evidencing extensions of credit, or applications for the extension of credit, jointly to Defendants Ertle and Gamble at any time from January 1, 2008 to the present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15:

Please produce a copy of all monthly credit card statements for any credit card belonging to or used for the benefit of Defendant Mechanical Woman, Inc., AAA Transmission, or AAA Transmission Specialists, or for the benefit of any accounting or bookkeeping business operated by Defendants Ertle or Gamble at any time from January 1, 2008 to the present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16:

Please produce a copy of any employment agreement or agreements to which any Defendant is, or was, a party at any time from January 1, 2008 to the present.

RESPONSE:

Respectfully submitted,

/s/ Roman Arce

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